

**STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION**

**APPLICATION OF CONOCOPHILLIPS
COMPANY FOR COMPULSORY POOLING
AND APPROVAL OF NON-STANDARD
SPACING UNIT, EDDY COUNTY,
NEW MEXICO.**

CASE NO. 25313

PRE-HEARING STATEMENT

ConocoPhillips Company (“COPC” or “Applicant”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT

ConocoPhillips Company

ATTORNEYS

Dana S. Hardy
Jaclyn M. McLean
Daniel B. Goldberg
Hardy McLean LLC
125 Lincoln Ave, Ste. 223
Santa Fe, NM 87501
Phone: (505) 230-4410
dhardy@hardymclean.com
jmclean@hardymclean.com
dgoldberg@hardymclean.com

INTERESTED PARTY

None.

ATTORNEYS

STATEMENT OF THE CASE

In Case No. 25313, Applicant seeks an order pooling all uncommitted interests in the Bone Spring formation underlying a 1,920-acre, more or less, non-standard horizontal spacing unit comprised of all of Sections 27, 28 and 29, Township 23 South, Range 30 East, Eddy County, New Mexico (“Unit”). The Unit will be dedicated to the following wells (“Wells”):

- a. **Iron Throne Federal Com #501H**, which will be drilled from a surface hole location in the SW/4 NW/4 (Unit E) of Section 26 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 29;
- b. **Iron Throne Federal Com #502H** and **Iron Throne Federal Com #503H**, which will be drilled from surface hole locations in the SW/4 NW/4 (Unit E) of Section 26 to bottom hole locations in the SW/4 NW/4 (Unit E) of Section 29;
- c. **Iron Throne Federal Com #504H**, which will be drilled from a surface hole location in the NW/4 SW/4 (Unit L) of Section 26 to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 29; and
- d. **Iron Throne Federal Com #505H**, which will be drilled from a surface hole location in the NW/4 SW/4 (Unit L) of Section 26 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 29.

The completed intervals of the Wells will be orthodox.

Also to be considered will be the cost of drilling and completing the Wells, the allocation of the costs, the designation of Applicant as operator of the Unit and the Wells, a 200% charge for the risk involved in drilling and completing the Wells, and approval of the non-standard spacing unit.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Macie Valles	Landman	Affidavit	Approx. 5
Shariva Darmaeon	Geologist	Affidavit	Approx. 4

PROCEDURAL MATTERS

Applicant intends to present this case by affidavit if there is no opposition to its application.

Respectfully submitted,

HARDY McLEAN LLC

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn M. McLean

Daniel B. Goldberg

125 Lincoln Ave, Ste. 223

Santa Fe, NM 87501

Phone: (505) 230-4410

dhardy@hardymclean.com

jmclean@hardymclean.com

dgoldberg@hardymclean.com

Counsel for ConocoPhillips Company

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 457535

QUESTIONS

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID: 217817
	Action Number: 457535
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>